

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
McALLEN DIVISION

UNITED STATES OF AMERICA	§	
	§	
VS.	§	Criminal No. 7:19-cr-00522
	§	
DANIEL GARCIA	§	

**DEFENDANT'S MOTION TO ADOPT AND CONFORM APPLICABLE
MOTIONS OF EACH CO-DEFENDANT AND MEMORANDUM IN SUPPORT**

COMES NOW, DANIEL GARCIA, by and through undersigned counsel, and respectfully moves to adopt, conform and have the benefit of applicable motions filed by any co-defendant indicted in the above-styled action. As grounds for this motion, defendant states as follows:

(1)

Defendant is charged in this case with three other defendants. Counsel for defendant is aware that counsel for co-defendants will file motions that may well be applicable to each defendant.

(2)

So as to reduce the burden on this Court and with respect to repetitive pleadings, defendants hereby adopts all applicable motions of any co-defendant. Defendant will conform them, if necessary, and, if appropriate, will add supplemental memoranda in support thereof. If defendant does not intend to adopt a motion of a co-defendant, the Court will be notified promptly. Otherwise, defendant will have been presumed to have adopted all motions of his co-defendants, not inconsistent with defendant's position.

(3)

Discovery proceedings are still in progress. Due to the complexity of this case and the nature of the charges and indictment, the above relief is necessary in the interest of justice, for due process of law, and for effective assistance of counsel. Further, the undersigned was struck with a ransomware attack, and has to some extent been hampered in preparation of motions.

WHEREFORE, defendant respectfully requests that this Motion to Adopt and Conform Applicable Motions of Other Defendants be granted.

Respectfully submitted,

/s/ Clay S. Conrad

Clay S. Conrad

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CERTIFICATE OF CONFERENCE

The Government has been contacted for its position on this Motion, but it has not responded whether it is in opposition or not.

By: /s/ Clay S. Conrad
Clay S. Conrad

CERTIFICATE OF SERVICE

This is to certify that on September 20, 2019, a true and correct copy of this motion was served on all parties of record via ECF.

By: /s/ Clay S. Conrad
Clay S. Conrad